

# **EXHIBIT 6**

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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,  v.  GOOGLE INC.,	Plaintiff,  Defendant.	CIVIL ACTION NO. 2:17-CV-442-JRG LEAD CASE  PATENT CASE  JURY TRIAL DEMANDED
v.  SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG ELECTRONICS CO., LTD.,	Defendants.	CIVIL ACTION NO. 2:17-CV-441-JRG CONSOLIDATED CASE

**SEVEN NETWORKS, LLC'S INITIAL DISCLOSURES**

Plaintiff SEVEN Networks, LLC (“Seven” or “Plaintiff”) submits these initial disclosures pursuant to paragraph 1 of the Discovery Order. Seven makes these initial disclosures based on knowledge and information reasonably available at this time.

**(a) The correct names of the parties to the lawsuit.**

Seven Networks, LLC is the correct name of the Plaintiff. On information and belief, Google LLC,<sup>1</sup> Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. are the correct names for Defendants.

**(b) The name, address, and telephone number of any potential parties.**

Seven is currently unaware of any potential parties to these suits.

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<sup>1</sup> Google, Inc. filed its Unopposed Motion to Substitute Party and Reflect Name Change from Google Inc. to Google LLC (Dkt. 67).

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- (c) The legal theories and, in general, the factual bases of the disclosing party's claims or defenses (the disclosing party need not marshal all evidence that may be offered at trial).**

Seven contends that Defendants have directly and indirectly infringed one or more claims of the patents-in-suit as set forth in Seven's complaints and P.R. 3-1 disclosures served on each of the Defendants. Defendants employ various technologies for enhancing the user experience that infringe Seven's patents. Generally, mobile products of both Defendants include infringing technologies to increase battery life. Google additionally offers services, such as its Google Play store and 2-Step Verification that infringe one or more of the patents-in-suit.

With respect to direct infringement, for example, Defendants' mobile products, such as smartphones and tablets, include technologies for managing mobile traffic and conserving network and battery resources. These technologies are included in various power saving modes, Doze, and App Standby functionalities provided in Defendants' products. These products meet each and every element of the asserted claims from U.S. Pat. Nos. 8,811,952; 9,247,019; 9,325,600; 9,351,254; 9,516,127; 9,516,129; and 9,553,816. As another example, Google's Play store infringes the asserted claims of U.S. Pat. No. 8,078,158 and 9,386,433 by implementing technologies for providing product specific applications and digital content. Finally, as yet another example, Google's 2-Step Verification infringes the asserted claims of U.S. Pat. No. 9,444,812. The factual bases for these claims are provided, in detail, in Seven's infringement contentions, which are incorporated herein by reference.

Defendants also indirectly infringe one or more claims of the patents-in-suit. For example, Samsung and Google induce end users of their mobile devices to infringe the asserted claims of each of the '952, '019, '600, '254, '127, '129, and '816 patents by using the infringing

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mobile products. Defendants actively promote, advertise, and encourage end users to use the accused traffic management and battery saving features of their mobile devices. Defendants also actively encourage users to upgrade their mobile devices to include the infringing technologies. Such promotional materials have been available on the companies' respective websites. Defendants have known of the patents-in-suit and their alleged infringement since at least as early as the filing of the instant lawsuits, and in some instances had pre-suit knowledge of the patents.

Additionally, Google contributes to the infringement by others of the asserted claims of the '952, '019, '600, '254, '127, '129, and '816 patents by selling or offering to sell power saving, Doze, and App Standby functionalities to its Android partners, that are then incorporated into infringing mobile devices. For example, Google sells or offers to sell certain Android operating systems, which include power saving, Doze, and App Standby functionalities to companies such as Samsung. Samsung then incorporates the Android operating system into its mobile devices that are made, used, sold, or offered for sale within the United States, or imported into the United States. As detailed in Seven's infringement contentions, the accused power saving, Doze, and App Standby functionalities constitute a material part of the alleged infringement. The accused functionalities are specifically developed to conserve network and battery resources and have no suitable noninfringing use. Google has been aware of the patents-in-suit and its alleged infringement since at least as early as the filing of this suit.

Google also induces end users to infringe the asserted claims of the '433 and '812 patents. As provided in Seven's infringement contentions, Google's Play store and 2-Step Verification systems infringe the asserted claims of the '433 and '812 patents, respectively. Google induces

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end users to put these systems into use, thereby infringing the asserted claims. Google advertises and promotes the use of these two systems, and such promotional materials have been available on Google's website.

Despite having knowledge of the patents-in-suit and their alleged infringement, Defendants continue to intentionally and willfully infringe the asserted claims. For example, even though Defendants are fully aware of their alleged infringement, they continue to make, use, sell, or offer to sell in the United States, or import into the United States the infringing products without alteration.

Seven is entitled to damages adequate to compensate it for Defendants' unlawful infringement, the extent of which is currently unknown and requires discovery from Defendants. Seven's damages are no less than a reasonable royalty for Defendants' use of the inventions disclosed by the patents-in-suit, together with interests and costs, pursuant to 35 U.S.C. § 284. A reasonable royalty may be determined by analysis of a variety of factors, such as those set forth in *Georgia-Pacific Corp. v. U.S. Plywood Corp.*, 318 F. Supp. 116 (S.D.N.Y. 1970). Seven further seeks an award of prejudgment interest, pursuant to 35 U.S.C. § 284, from the date that infringement began until a judgment for damages is entered and a further award of post-judgment interest, pursuant to 28 U.S.C. §1961, continuing until such judgment is paid. Seven is also entitled to an award of all costs and reasonable attorneys' fees against Defendants, pursuant to 35 U.S.C. §§ 284 and 285; and, if Defendants' acts of infringement are determined to be willful, an award of treble damages, pursuant to 35 U.S.C. § 284. Seven requires additional discovery to determine the extent of Defendants' infringement, weigh the various factors, and compute the appropriate amount of damages in this matter.

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- (d) The name, address, and telephone number of persons having knowledge of relevant facts, a brief statement of each identified person's connection with the case, and a brief, fair summary of the substance of information known by any such person.

Seven does not consent to or authorize any party to communicate with its current or former employees.

Name, Address, and Telephone Number	Subjects of Discoverable Information
[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED]
Alisawi, Rami  Last known address: [REDACTED] [REDACTED] [REDACTED]	Mr. Alisawi is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
Alvarado, William  Last known address: [REDACTED] [REDACTED]	Mr. Alvarado is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.

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Name, Address, and Telephone Number	Subjects of Discoverable Information
<p>Backholm, Ari</p> <p>To be contacted through counsel for Seven.</p>	<p>Mr. Backholm is a named inventor of one or more of the patents-in-suit and has knowledge relating to the conception and reduction to practice of the inventions disclosed therein. Mr. Backholm is also the Chief Technology Officer for Seven and has knowledge relating to the design and development of Seven's products, including products that incorporate one or more of the technologies disclosed in the patents-in-suit, along with other activities of Seven.</p>
<p>Benitez, Juan</p> <p>Last known address:</p> <p>[REDACTED]  [REDACTED]  [REDACTED]</p>	<p>Mr. Benitez is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.</p>
<p>Bott, Ross</p> <p>To be contacted through counsel for Seven.</p>	<p>Mr. Bott is the President and Chief Executive Officer of Seven and has information regarding the company's history of innovation, operations, governance, and financials.</p>
<p>Boynton, Lee R.</p> <p>Last known address:</p> <p>[REDACTED]  [REDACTED]</p>	<p>Mr. Boynton is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.</p>
<p>Burke, Scott M.</p> <p>Last known address:</p> <p>[REDACTED]  [REDACTED]</p>	<p>Mr. Burke is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.</p>

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Name, Address, and Telephone Number	Subjects of Discoverable Information
Duncan, Fred J.  Seven is unaware of Mr. Duncan's address or phone number.	Mr. Duncan is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
Fatial, Trevor A.  To be contacted through counsel for Seven.	Mr. Fatial is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED]  [REDACTED]	[REDACTED]  [REDACTED]  [REDACTED]
Gustafson, Brian D.  Last known address:  [REDACTED]  [REDACTED]	Mr. Gustafson is a named inventor on one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED]  [REDACTED]	[REDACTED]  [REDACTED]  [REDACTED]  [REDACTED]

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Name, Address, and Telephone Number	Subjects of Discoverable Information
[REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Lin, Ruth  Seven is unaware of Ms. Lin's address or phone number.	Ms. Lin is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
Luna, Michael  To be contacted through counsel for Seven.	Mr. Luna is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED] [REDACTED]	[REDACTED]
Merriwether, David  To be contacted through counsel for Seven.	Mr. Merriwether is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

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Name, Address, and Telephone Number	Subjects of Discoverable Information
Nirantar, Abhay  To be contacted through counsel for Seven.	Mr. Nirantar is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED]  [REDACTED]  [REDACTED]	[REDACTED]  [REDACTED]  [REDACTED]
Petersen, Steve  To be contacted through counsel for Seven.	Mr. Petersen is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
Raj, Binu  Last known address:  [REDACTED]  [REDACTED]	Mr. Raj is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED]  [REDACTED]  [REDACTED]	[REDACTED]  [REDACTED]  [REDACTED]
Sawhney, Parvinder  Seven is unaware of Mr. Sawhney's address or phone number.	Mr. Sawhney is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.

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Name, Address, and Telephone Number	Subjects of Discoverable Information
Seleznyov, Alexandr  To be contacted through counsel for Seven.	Mr. Seleznov is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED]  [REDACTED]  [REDACTED]	[REDACTED]  [REDACTED]  [REDACTED]  [REDACTED]
Sutaria, Jay  Last known address:  [REDACTED]  [REDACTED]	Mr. Sutaria is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
van Gent, Robert Paul  Last known address:  [REDACTED]  [REDACTED]  [REDACTED]	Mr. van Gent is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
[REDACTED]  [REDACTED]  [REDACTED]	[REDACTED]  [REDACTED]  [REDACTED]
Wei, Jie "Cliff"  To be contacted through counsel for Seven.	Mr. Wei is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.

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Name, Address, and Telephone Number	Subjects of Discoverable Information
Yoon, Sungwook  To be contacted through counsel for Seven.	Mr. Sungwook is a named inventor of one or more of the patents-in-suit and may have knowledge relating to the conception and reduction to practice of the inventions disclosed therein.
Employees of Samsung 1301 E. Lookout Dr. Richardson, Texas 75080	Employees of Samsung will have knowledge at least regarding the design, development, manufacture, sale, offers to sell, use, and importation of accused products, and information relating to damages.
Employees of ZTE USA 2425 N. Central Expy., Suite 800 Richardson, Texas 75080	Employees of ZTE USA will have knowledge at least regarding the design, development, manufacture, sale, offers to sell, use, and importation of accused products, and information relating to damages.
Employees of Google, LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Employees of Google will have knowledge at least regarding the design, development, manufacture, sale, offers to sell, use, and importation of accused products, and information relating to damages.
Employees of companies within the Eastern District of Texas that sell accused Google and Samsung products, such as:  Best Buy 422 W. Loop 281 Ste 100 Longview, Texas 75605 Phone: 903-757-9212	Employees of these companies will have knowledge at least relating to the sale and/or use of accused products, and the importance of the accused features to customers.
Employees of Texas State Technical College 2650 East End Blvd., South Marshall, Texas 75672	Employees of TSTC will have knowledge regarding Seven's contacts and activities in the Marshall community.

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Seven incorporates by reference individuals or entities identified by Defendants in their Initial Disclosures.

- (e) Any indemnity and insuring agreements under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.**

Seven is unaware of any such agreements.

- (f) Any settlement agreements relevant to the subject matter of this action.**

Seven is unaware of any such agreements.

- (g) Any statement of any party to the litigation.**

Seven has no additional statement at this time.

Dated: October 11, 2017

Respectfully submitted,

*/s/ Vishal Patel*

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2017 the foregoing initial disclosures statement was served by email on counsel for Defendants.

*s/ Vishal Patel*  
Vishal Patel